

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

ACKERMAN MCQUEEN, INC.'S AMENDED TRIAL EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and the Court’s October 13, 2020 Scheduling Order (ECF 174), as amended (ECF 358), Defendant/Counter-Plaintiff Ackerman McQueen, Inc. (“**AMc**”) and Defendants Mercury Group, Inc. (“**Mercury**”), Henry Martin (“**Martin**”), William Winkler (“**Winkler**”), and Melanie Montgomery (“**Montgomery**”) (collectively, “**AMc**”) hereby submit their *Amended Trial Exhibit List*.

AMc may, at its sole election, request that the Court take judicial notice of, or otherwise offer any of, the below listed documents into evidence at the time of the trial. AMc further reserves the right to offer any documents, which may be designated or offered by the NRA. AMc, in its sole discretion, additionally reserves the right to offer or use any exhibits (whether designated below or by the NRA) as may be necessary for cross-examination, impeachment, or rebuttal. AMc further reserves the right to supplement or amend this exhibit list at any time.

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
001	4/30/2017	2017 Services Agreement between NRA and AMc	AM 00000162			
002	5/6/2018	Amendment #1 to Services Agreement	AMc-056592			
003	5/11/2018	NRA v. Cuomo, et al., Original Complaint (N.D. N.Y.)				
004	5/29/2018	NRA v. Lockton, Original Complaint (E.D. Virginia)				
005	7/20/2018	NRA v. Cuomo, et al., Amended Complaint (N.D. N.Y.)				
006	9/13/2018	Order revoking of <i>pro hac vice</i> (E.D. Virginia)				
007	4/12/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19001757)				
008	5/22/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19002067)				
009	6/19/2019	NRA v. Col. North, Original Complaint (NY State Court)				
010	8/30/2019	NRA v. AMc, et al., Original Complaint (N.D. Tex.)				
011	9/5/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19002886)				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
012	8/6/2020	NYAG v. NRA, et al., Original Complaint (NY State Court)				
013	2/23/2021	NYAG v. NRA, et al., Wayne LaPierre Verified Answer				
014	5/11/2021	Order Granting Motions to Dismiss (B.K. N.D. Tex.)				
015		Audit Documents	AMc-0028792 - AMc-0034631			
016	3/30/2017	Email from Steve Hart to Bill Winkler	Hart Ex. 17			
017	5/23/2018	NRA Supplier Meeting Agenda	NRA-AMc_00200788			
018	4/14/2017	Email from Bill Winkler to Steve Hart	AMcTX-0065465			
019	4/20/2017	Email from Bill Winkler to Steve Hart	Hart Ex. 19			
020	1/16/2018	Email from Josh Powell to Andrew McKenna, Tony Makris, and Colleen Gallagher	AMc-035712			
021	3/28/2018	Correspondence from John Frazer to Lacey Cremer and Melanie Montgomery	AMcTX-0000009			
022	4/24/2019	Letter from Wayne LaPierre to John Frazer and Charles Cotton	NRA-AMc_00200450			
023	4/13/2018	Email from Bill Brewer to Angus McQueen	AMcTX-00037265			
024	4/23/2018	Email from Tony Makris to Steve Hart and others	AMc-044429			
025		2019 Budget for C. Spray	NRA-AMc_00200742			
026	5/11/2018	Email from Bill Winkler to Woody Phillips	AMcTX-00000027			
027	5/21/2018	Email from Melanie Montgomery to Bill Winkler and Susan LaPierre	AMcTX-00002090			
028	5/25/2018	Email from Josh Powell to Tony Makris	AMcTX-00065337			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
029		2018 Budget – Revised	NRA-AMc_00200745			
030	7/10/2018	Email from Steve Hart to Melanie Montgomery	Hart Ex. 6			
031	7/10/2018	Email from Steve Hart to Melanie Montgomery	AMcTX-00041549			
032	2/6/2019	Emails between Jessica Bradley and Bill Winkler	AMc-057912			
033	7/13/2018	Email from Sonya Rowling to Rick Tedrick	NRA-AMc_00063924			
034	7/13/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065338			
035	4/28/2019	Email from Steve Hart to Michael Volkov	NRA-AMc_00185755			
036	8/6/2018	Email from Tony Makris to Melanie Montgomery, Henry Martin, and Angus McQueen	AMcTX-00065357			
037	8/7/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065369			
038	8/8/2018	Letter from Bill Brewer to Jay Madrid	AMcTX-00065352			
039	8/8/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00068307			
040	8/8/2018	Correspondence from Woody Phillips to Bill Winkler	NRA-AMc_00068309			
041	1/19/2019	Email from Susan Dillon to Sarah Rogers	NRA_AM_FRA_0013029			
042	8/13/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00063983			
043	8/14/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00057152			
044	8/15/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00057176			
045	8/17/2018	Email from Travis Carter to Andrew Arulanandam and Jennifer Baker	AMcTX-00065360			
046	8/22/2018	Letter from Stephen Ryan to Bill Brewer	AMcTX-00065340			
047	8/27/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00071260			
048	8/28/2018	Letter from Bill Winkler to Woody Phillips	AMc-058391			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
049	8/29/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00057263			
050	9/24/18	Angus McQueen Draft Letter to Wayne LaPierre	AMc-058564			
051	9/4/2018	Letter from Bill Winkler to Woody Phillips	AMc-057593			
052	9/5/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065354			
053	9/6/2018	Email from Stephen Ryan to Bill Brewer	AMcTX-00065362			
054	9/12/2018	Letter from Bill Winkler to Woody Phillips	AMcTX-00000200			
055	9/12/2018	Letter from Bill Brewer to Jay Madrid	AMcTX-00065346			
056	9/13/2018	Email from John Frazer to Gina Betts and Sarah Rogers	NRA-AMc_00064053			
057	9/13/2018	Email from D. Reno to L. Supernaugh	NRA-AMc_00068484			
058	9/14/2018	Email from Sarah Rogers to Gina Betts and John Frazer	NRA-AMc_00057268			
059	9/17/2018	Email from Lacey Cremer to Craig Spray, Melanie Montgomery, and Nader Tavangar	AMc-031560			
060	9/21/2018	Email from Lisa Supernaugh to AMc	AMc-028858			
061	9/24/2018	Letter from Bill Winkler to Craig Spray	NRA-AMc_00057300			
062	9/25/2018	Letter from Jay Madrid to Steve Hart	AMcTX-00065322			
063	9/25/2018	Letter from Wayne LaPierre to Bill Winkler	NRA-AMc_00057314			
064	9/25/2018	Letter from Josh Powell to Bill Winkler	NRA-AMc_00057315			
065	9/25/2018	Letter from Bill Winkler to Josh Powell	NRA-AMc_00057329			
066	9/26/2018	Email from Steve Hart to Tony Makris	Hart Ex. 11			
067	9/28/2018	Letter from Bill Winkler to Josh Powell	AMc-031718			
068	10/2/2018	Letter from Bill Winkler to Josh Powell	AMc-043863			
069	10/2/2018	Letter form Richard Sayles to Steve Hart	NRA-AMc_00160786			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
070	10/4/2018	Correspondence from Josh Powell to Bill Winkler	NRA-AMc_00057377			
071	10/4/2018	Correspondence from Wayne LaPierre to Bill Winkler	NRA-AMc_00060919			
072	10/5/2018	Letter from Bill Winkler to Craig Spray	AMc-034913			
073	10/6/2018	Letter from Craig Spray to Bill Winkler				
074	10/9/2018	Letter from Bill Winkler to Craig Spray	AMc-058072			
075	10/11/2018	Email between Steve Hart and Tony Makris	Hart Ex. 14			
076	10/16/2018	Correspondence from Wayne LaPierre to Bill Winkler	NRA-AMc_00090636			
077	10/31/2018	Email from Todd Grable to AMc Team	AMc-037921			
078	10/31/2018	Email from Craig Spray to Bill Winkler and Melanie Montgomery	AMc-059342			
079	11/2/2018	Email from Craig Spray to Melanie Montgomery	AMcTX-00000333			
080	11/16/2018	Email from Nicole Reaves to Lacey Cremer and Bill Winkler	AMcTX-00065308			
081	2/4/2016	Email from Trisha Parker to Melanie Montgomery	AMcTX-00065138			
082	11/26/2018	Email from Craig Spray to Melanie Montgomery and Lacey Cremer	AMcTX-00000776			
083	12/6/2018	Text Message from Craig Spray to Melanie Montgomery	AMcTX-00064686			
084	12/14/2018	Correspondence between Steve Hart and Tony Makris	AMc-044420			
085	12/20/2018	Email from Bill Winkler to Craig Spray	NRA-AMc_00112506			
086	12/21/2018	Letter from Sarah Rogers to Jay Madrid	NRA-AMc_00068870			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
087	1/4/2019	Letter from Jay Madrid to Steve Hart	NRA-AMc_00065378			
088	1/7/2019	Email from Oliver North to AMc	AMc-039381			
089	1/10/2019	Letter from Stephen Ryan to Steve Hart	Hart Ex. 23			
090	1/17/2019	Email between Stephen Ryan, John Frazer, and Steve Hart	NRA-AMc_00058457			
091	1/21/2019	Emails between Stephen Ryan, Steve Hart, and John Frazer	NRA_AM_FRA_0002614			
092	1/22/2019	Emails between Stephen Ryan, Steve Hart, and John Frazer	NRA-AMc_00058512			
093	1/30/2019	Email from John Frazer to Stephen Ryan	NRA-AMc_00058587			
094	1/31/2019	Emails between John Frazer, Stephen Ryan, and Gina Betts	NRA-AMc_00058659			
095	2/3/2019	Email from John Frazer to Gina Betts	NRA_AM_FRA_0000668			
096	2/6/2019	Email from Susan Dillon to FRA Employee	NRA_AM_FRA_0001437			
097	2/6/2019	Email from Jessica Bradley to Bill Winkler	NRA_AM_FRA_0001449			
098	2/6/2019	Email from Bill Winkler to Jessica Bradley	NRA_AM_FRA_0001451			
099	2/8/2019	Emails between Bill Winkler and Jessica Bradley	NRA_AM_FRA_0001490			
100	2/8/2019	Correspondence from John Frazer to Stephen Ryan and Gina Betts	NRA-AMc_00064546			
101	2/11/2019	Letter from Stephen Ryan to John Frazer	AMcTX-00065329			
102	2/12/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065330			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
103	2/6/2022	In the Matter of Dana Loesch v. AMc: Partial Final Award	AMcTX-0339422			
104	2/18/2019	Emails between Jessica Bradley, Bill Winkler, and Gina Betts	NRA_AM_FRA_0001954			
105	7/29/2015	Email from Melanie Hill to Trisha Parker	AMcTX-00065414			
106	2/20/2019	Email from John Frazer to Stephen Ryan and Gina Betts	NRA-AMc_00059149			
107	2/22/2019	Email from Steve Hart to Tony Makris	Hart Ex. 36			
108	2/22/2019	Emails from Susan Dillon to Sarah Rogers	NRA_AM_FRA_0002037			
109	2/26/2019	Letter from Oliver North, Richard Childress, and Carolyn Meadows to Wayne LaPierre	N2-00050			
110	2/26/2019	Emails between Steve Hart and Anthony Makris	AMcTX-00011318			
111	2/26/2019	Emails between Stephen Ryan and John Frazer	NRA-AMc_00059246			
112	2/26/2019	Correspondence from Wayne LaPierre to Oliver North	NRA-AMc_00064573			
113	3/4/2019	Letter from John Frazer to Stephen Ryan	Frazer Ex. 30			
114	3/7/2019	Email from Melanie Montgomery to Craig Spray	AMc 001275			
115	3/7/2019	Email from Stephen Ryan to John Frazer	NRA-AMc_00059288			
116	7/7/2021	Email from Trisha Parker to Melanie Montgomery	AMcTX-65143			
117	3/8/2019	Email from Stephen Ryan to John Frazer	NRA-AMc_00059305			
118	3/11/2019	Email from Tony Makris to John Frazer	AMc-035260			
119	3/11/2019	Message from Wayne LaPierre to NRA Board	AMc-035262			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
120	3/12/2019	Correspondence from Jay Madrid to John Frazer	AMcTX-00065364			
121	3/14/2019	Letter from John Frazer to Jay Madrid	AMc-035264			
122	3/4/2019	2019 Billing Schedule for C. Spray	NRA-AMc_00200736			
123	3/21/2019	Correspondence from Brendan Sullivan to Bill Brewer	OLN00208			
124	3/22/2019	Email from Oliver North to John Frazer	Meadows Ex. 2			
125	3/22/2019	Correspondence from Oliver North to Bill Brewer	NRA-AMC_00069015			
126	3/22/2019	Correspondence from Oliver North to NRA Audit Committee	North Ex. 14			
127	3/25/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065371			
128	3/25/2019	Correspondence from John Frazer to Oliver North	Frazer Ex. 42			
129	3/25/2019	Correspondence from Bill Brewer to Brendan Sullivan	OLN00214			
130	11/2/2018	Email from Craig Spray to Melanie Montgomery and Bill Winkler	NRA-AMc_00057619			
131	3/26/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065332			
132	3/29/2019	Letter from Wayne LaPierre to NRA Board	NRA-AMc_00191401			
133	3/31/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00216			
134	4/3/2019	Correspondence from Wayne LaPierre to Oliver North	OLN0221			
135	4/4/2019	Email from Steve Hart to Tony Makris	AMcTX-00011450			
136	4/8/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00225; NRA-AMc_00199755			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
137	4/9/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00173			
138	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery	AMcTX-00000581			
139	4/11/2019	Correspondence from Oliver North to John Frazer and Charles Cotton	NRA-AMc_00069094; NRA-AMc_00059415			
140	4/12/2019	Email from Charles Cotton to Oliver North	NRA-AMc_00059433			
141	5/7/2019	An Internal Memo Raises New Questions About Self-Dealing at the NRA by Mark Spies				
142	4/15/2019	Message from Wayne LaPierre to NRA Board	DB_0216			
143	4/15/2019	Email from Danny Hakim to Andrew Arulanandam	NRA-AMc_00069104			
144	4/30/2019	Concur Expense Report	AMcTX-00067318			
145	4/18/2019	Correspondence from Oliver North and Richard Childress to John Frazer and Charles Cotton	OLN00185; NRA-AMc_00200725			
146	4/18/2019	Text Message from Allen West to Millie Hallow	OLN00367			
147	4/22/2019	Letter from Wayne LaPierre to Mark Dycio	AMcTX-00065334			
148	4/22/2019	Letter from Wayne LaPierre to Steve Hart	AMc-035391			
149	4/22/2019	Email from Steve Hart to NRA Executives and Board Members	OLN00015			
150	4/22/2019	Letter from Bill Winkler to Craig Spray	NRA-AMc_00069698			
151	4/22/2019	Letter from Bill Winkler to Tyler Schropp	LaPierre Ex. 21			
152	4/22/2019	Letter from Bill Winkler to Craig Spray	AMc 001304			
153	4/22/2019	Message from Wayne LaPierre to NRA Board	OLN00076			
154	4/24/2019	Email from Millie Hallow to Oliver North	NRA-AMc_00061214			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
155	4/25/2019	Email from Oliver North to John Frazer	NRA-AMc_200692			
156	4/25/2019	Letter from Wayne LaPierre to NRA Board	NRA-AMc_00161960			
157	4/25/2019	Correspondence from Oliver North to NRA Board and Executive Council	OLN00093			
158	4/25/2019	Correspondence from Oliver North to NRA Executive Committee	NRA-AMc_00200692			
159	4/25/2019	Email from Eric Van Horn to Caitlin Fiandt, John DaSilva, Cameron Collins, and Woody Arenas	AMc-041806			
160	4/26/2019	Email from Steve Hart to John Frazer and Wayne LaPierre	NRA-AMc_00059559			
161	4/27/2019	Email from John Frazer to NRA Board	NRA-AMc_00140486			
162	4/27/2019	Statement from Wayne LaPierre to NRA Board	OLN00106			
163	5/5/2019	Email from Wayne LaPierre to Melanie Montgomery	NRA-AMc_00064984			
164	5/6/2019	Letter from Bill Winkler to Craig Spray	AMc 001309			
165	5/9/2019	Email from Andrew Arulanandam to Melanie Montgomery and Henry Martin	NRA-AMc_00059652			
166	5/10/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00086579			
167		Projected Increases to NRA Fees	AMcTX-0067704			
168	5/13/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00124518			
169	5/22/2019	Letter from Carolyn Meadows and Charles Cotton to NRA Members	NRA-AMc_00199649			
170	5/24/2019	Correspondence from Andrew Arulanandam to Melanie Montgomery	NRA-AMc_00059838			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
171	5/29/2019	Notice of Termination of Services Agreement from AMc to NRA	NRA-AMc_00059931			
172	5/30/2019	Letter from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00059946			
173	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00065094			
174	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00059982			
175	6/3/2019	Email from Bill Winkler to Craig Spray	AMcTX-00065350			
176	6/18/2019	Emails from David Schertler to Andrew Arulanandam, Melanie Montgomery, Angus McQueen, and Revan McQueen	Arulanandam Ex. 6			
177	6/25/2019	Correspondence from Andrew Arulanandam to Dana Loesch	NRA-AMc_0019094			
178	6/25/2019	Notice of Termination of Services Agreement from Andrew Arulanandam	NRA-AMc_00060185			
179	7/22/2019	Letter from NRA Board Members to Carolyn Meadows, John Frazer, and NRA Board	AMcTX-00065468			
180	9/27/2019	Letter from Melanie Montgomery to Andrew Arulanandam				
181	10/25/2019	Letter from John Frazer to Gina Betts, Bill Winkler, and Rick Tedrick	AMcTX-00045606			
182	7/22/2021	All Invoices – NR Analysis	AMcTX-00067978			
183	12/12/2019	Text Messages from Bill Brewer	GRANT0161			
184	6/5/2019	Email from Nader Tavangar to Rick Tedrick and Duane Reno	AMc-042077			
185	2/4/2021	Order Denying Motion to Transfer (<i>In re National Rifle Association Business Expenditures</i>)				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
186	1/14/2021	Letter from Brewer Attorneys & Counselors to John Frazer	NRA-BK-00060928			
187	4/5/2018	Email from Travis Carter to NRA	AMc-035792			
188	10/6/2016	2017 Budget Planning Document	NRA-AMc_00057337			
189	2/8/2019	Email from Bill Winkler to Jessica Bradley	AMc-057923			
190	4/23/2018	Deal Points for Oliver North Employment Agreement	OLN00398			
191	5/15/2018	Employment Agreement by and among AMc and Oliver North	AMc-056595			
192	5/21/2018	Invoice No. 001 from WBB Investments, LLC	AMcTX-00036157			
193	8/22/2019	NRA Shakes Up Legal Team Amid Intensifying War by Robert Costa				
194	7/6/2021	Dorsey & Whitney LLP Invoices (Dallas Action)	AMcTX-00065644			
195	9/8/2018	NRA Report of the Audit Committee	OLN00178			
196	2/8/2019	Email from Bill Winkler to Jessica Bradley	NRA-AMc_00064536			
197	10/24/2018	NRA Presidential Advisors Agenda	NRA-AMc_00057543			
198	12/4/2018	Revised 2019 Budget	AMcTX-00065137			
199	10/4/2018	Letter from Josh Powell to Bill Winkler	NRA-AMc_00057377			
200	1/1/2019	Amendment 1 to Oliver North Employment Agreement	AMc-059822			
201	1/4/2019	NRA Board Meeting Presentation				
202	1/18/2019	FRA/NRA Agreement	Trahar Ex. 1A			
203	2/5/2019	List of AMc Employees who worked on NRA Account	NRA-AMc_00193859			
204	3/4/2019	Spreadsheet Prepared by Melanie Montgomery	AMcTX-000065136			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
205	6/8/2021	Dorsey & Whitney LLP Invoices (Loesch Arbitration)	AMc-TX-00066503			
206	3/21/2019	Memo from Morgan Lewis Bockius LLP to NRA Officers	NRA-BK-00177963			
207	4/15/2019	NRA Invoices and Related Emails	Supernaugh Ex. 8			
208	4/29/2019	Email from Andrew Arulanandam to Fischer	NRA-AMc_00059584			
209	10/5/2018	Letter from Craig Spray to Bill Winkler	AMcTX-00000296			
210	7/15/2019	Memorandum prepared by Emily Cummins	LaPierre Ex. 16			
211	1/4/2020	Invoice for Professional Services from Brewer Attorneys & Counselors	NRA-BK-00061283			
212	1/10/2020	FRA Updated Privilege Log				
213		NRA Second Amended Privilege Log				
214	1/11/2016-12/19/2016	American Express Credit Card Statement of Tyler Schropp	AM 00000987			
215	9/9/2019	Dorsey & Whitney LLP (Professional Fundraising Counsel Registrations)	AMcTX-00066490			
216	4/17/2019	Article titled "Secrecy, Self-Dealing and Greed at the NRA"				
217	4/26/2019	Article titled "NRA's Wayne LaPierre Says He is Being Extorted, Pressured to Resign" in The Wall Street Journal				
218	4/26/2019	Email from David Valinski	Frazer Ex. 66			
219	5/6/2019	Article titled "Advocacy as Art: Lawyers Must Engage in Issues and Crisis Management"				
220		Zillow Listing	LaPierre Ex. 27			
221	12/5/2018-1/14/2021	Invoices for Professional Services from Brewer Attorneys & Counselors	NRA-BK-00060718			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
222	5/1/1999	Services Agreement by and among NRA and AMc	NRA-AMc_00048503			
223		2015 Freestyle Network Screenshot	AMcTX-00067936			
224		NRA Media Projects Screenshot	AMcTX-00067937			
225	1/3/2017	Invoice from Corporate America Aviation, Inc.	Cotton Ex. 10			
226	1/2/2018	Email from Josh Powell to Tony Makris	AMc-029887			
227		AMc Invoice Backup Spreadsheet	AMcTX-00067933			
228	11/9/2018	Email from Nicole Reaves to Bill Winkler, Melanie Montgomery, and Lacey Cremer	AMc-TX0065297			
229		Attachment from Nicole Reeves				
230	4/13/2017	AMc Invoice No. 148177	NRA-NYAG-00013071			
231	2018	2018 NRA Budget	AMcTX-00065392			
232		Media Buy Transaction Ledger	AMcTX-00067934			
233	10/16/2018	2018 / 2019 Budget Comparison	AMcTX-00065376			
234	4/15/2019-7/22/2021	Invoices from 2019-2021	AMcTX-00065401			
235	10/11/2018	Letters from Bill Winkler to Oliver North and from Jay Madrid to Steve Hart	AMcTX-00065396			
236	1/2/2018	Email from Josh Powell to Tony Makris	AMcTX-00065335			
237	12/6/2016	2017 Budget	AMcTX-00065394			
238	11/18/2015	2016 Budget	AMcTX-00065395			
239	5/13/2019	Letter from Melanie Montgomery to Andrew Arulanandam	AMcTX-00003309			
240	1/24/2019	Email from Melanie Montgomery to Craig Spray	AMc-001227			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
241	10/9/2018	NRATV 2018 YTD: Analytics Executive Overview	AMc-002700			
242	1/1/2018 - 3/31/2018	NRATV Q1 2018: Analytics & Valuation	AMc-002713			
243	10/1/2016-12/20/2017	NRATV Analytics	AMc-002741			
244	1/1/2018 - 10/3/2018	NRATV YTD Q3'18: Analytics	AMc 002772			
245	10/1/2016-8/31/2017	NRATV Analytics Discussion	AMc 002818			
246	n/a	NRATV 2018 Vision Discussion	AMc 002835			
247	4/7/2019	NRATV 2019 Update	AMc 002844			
248	n/a	The Power of NRATV – Crafting and Owning a Narrative	AMc 002853			
249	n/a	The Clenched Fist of Truth	AMc 002929			
250	n/a	NRA America's Most Patriotic Brand	AMc 002956			
251	n/a	NRATV Commentators – 2017 Metrics	AMc-039158			
252	n/a	NRATV LOVE AT FIRST SHOT 2017 Metrics	AMc-039162			
253	n/a	NRATV Cam & Company – 2018 Metrics	AMc-040053			
254	n/a	NRATV Monetization Report	AMcTX-00000763			
255	5/31/2019	Email from Andrew Arulanandam to Melanie Montgomery, Lacey Cremer, Bill Winkler, Wayne LaPierre, Craig Spray, and John Frazer	NRA-AMc_00059956			
256	5/5/2019	Email from Nader Tavanger to Rick Tedrick and Duane Reno	AMc-042077			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
257	4/16/2019	Email to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	AMcTX-00019288			
258	6/12/2019	Email to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079124			
259	11/19/20	NRA 2020 IRS Form 990				
260	2/22/2019	Email from Craig Spray to Nader Tavangar and Bill Winkler	AMc-001257			
261	10/8/2018	Letter from Bill Winkler to Craig Spray	AMc-058072			
262	1/1/2018	Employment Agreement by and among Dana Loesch and AMc	AMc 000055			
263	2/22/2021	NRA Organizational Chart				
264	4/22/2019	Letter from Bill Winkler to Wayne LaPierre	NRA-AMc_0091615			
265	4/22/2019	Letter from Bill Winkler to Wayne LaPierre	NRA-AMc_00091621			
266	n/a	List of NRA Audit Committee Top Concerns	NRA-AMc_00063924			
267	5/7/2018	Text Messages from the Phone of Woody Phillips	AMcTX-00065643			
268	5/3/2018	Text Messages from the Phone of Woody Phillips	AMcTX-00065642			
269	7/13/2018	Email from Nader Tavanger to Woody Phillips, Lisa Supernaugh, and Duane Reno	AMc-036282			
270	2/20/2018	Pay Stubs and Electronic Deposit Stubs	NRA-AMc_00052128			
271	6/7/2018	Email from Craig Spray to Woody Phillips	NRA-AMc_00051582			
272	5/30/2019	Email from M. Erstling to Craig Spray, Sonya Rowling, and Lisa Supernaugh	NRA-AMc_00125414			
273	4/2/2019	Email from Nader Tavanger to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079067			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
274	3/4/2019	Email from Nader Tavanger to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079029			
275	6/5/2019	Letter from Andrew Arulanandum to Bill Winkler	NRA-AMc_00059992			
276	6/6/2019	Email from David Schertler to Andrew Arulanandum	NRA-AMc_00060001			
277	6/4/2019	Email from David Schertler to John Frazer	NRA-AMc_00059986			
278	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00059983			
279	6/7/2019	Email from Andrew Arulanandum to David Schertler	NRA-AMc_00060115			
280	6/10/2019	Email from David Schertler to Andrew Arulanandum	NRA-AMc_00060118			
281	6/11/2019	Email from Andrew Arulanandum to David Schertler and Melanie Montgomery	NRA-AMc_00060122			
282	6/14/2019	Email from Andrew Arulanandum to David Schertler	NRA-AMc_00060125			
283	06/27/2019	Letter from David Schertler to Andrew Arulanandum				
284	10/10/2019	Email from Nader Tavangar to Craig Spray and others regarding October invoice	NRA-AMc_00127308 - 309			
285	n/a	Summary of NRA Billing	AMcTX-00067978 - 68006			
286	11/10/2016	NRA 2015 IRS Form 990				
287	9/18/2017	NRA 2016 IRS Form 990				
288	11/05/2018	NRA 2017 IRS Form 990				
289	11/14/2019	NRA 2018 IRS Form 990				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
290	11/17/2020	NRA 2019 IRS Form 990				
291.00	10/15/2021	Amended Expert Report of Daniel L. Jackson				
291.01	1/1/2018	Loesch Agreement	AMc-000055			
291.02	6/21/2019	Mutual of Omaha Billing Statement	AMc-001335			
291.03	12/24/2020	List of Late Payments	AMc-002628			
291.04	9/4/2018	Valinkski Employment Agreement	AMc-036766			
291.05	5/1/2019	AMc Production Invoice No. 166346	AMc-041862			
291.06	5/1/2019	AMc Production Invoice No. 166340	AMc-041863			
291.07	5/1/2019	AMc Production Invoice No. 166339	AMc-041869			
291.08	5/17/2019	AMc Production Invoice No. 166804	AMc-041994			
291.09	6/1/2019	AMc Production Invoice No. 167037	AMc-042051			
291.10	5/1/2019	AMc Production Invoice No. 166340	AMc-042136			
291.11	9/10/2018	Mutual of Omaha Billing Statement	AMc-057610			
291.12	7/17/2018	Prudential EFT Notice	AMc-058265			
291.13	4/15/2019	AMc Production Invoice No. 166104	AMcTX-00019289			
291.14	12/12/2018	Virginia Lease Agreement	AMcTX-00036891			
291.15	10/18/2019	CenturyLink Disconnect Request	AMcTX-00045364			
291.16	7/16/2019	AT&T Account Statement	AMcTX-00045368			
291.17	10/8/2019	CenturyLink Invoice No. 85349561	AMcTX-00045395			
291.18	4/30/2018	Cisco Lease Agreement	AMcTX-00045403			
291.19	5/8/2018	Dell Financial Services Lease Agreement	AMcTX-00045408			
291.20	3/22/2018	iland Internet Solutions Work Order	AMcTX-00045414			
291.21	8/1/2019	Rent Invoice No. 208	AMcTX-00045456			
291.22	9/11/2019	AT&T Invoice No. 2854499405	AMcTX-00045457			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
291.23	9/19/2019	AT&T Invoice No. 5048360507	AMcTX-00045459			
291.24	10/19/2018	Email from Lacey Duffy to Trey Rick and Mark Ackerman	AMcTX-00045461			
291.25	1/15/2019	AMc Production Invoice No. 163943	AMcTX-00045467			
291.26	12/2/2019	AMc Production Invoice No. 171144	AMcTX-00045468			
291.27	12/2/2019	AMc Production Invoice No. 171498	AMcTX-00045469			
291.28	12/2/2019	AMc Production Invoice No. 170464	AMcTX-00045470			
291.29	6/12/2019	AMc Production Invoice No. 167453	AMcTX-00045496			
291.30	7/9/2019	AMc Production Invoice No. 168015	AMcTX-00045502			
291.31	10/10/2019	AMc Production Invoice No. 170388	AMcTX-00045503			
291.32	9/12/2019	AMc Production Invoice No. 169524	AMcTX-00045504			
291.33	5/30/2017	Colorado Springs Third Amendment to Lease	AMcTX-00045510			
291.34		TLUX CORP Invoice No. 1009	AMcTX-00045515			
291.35	10/2/2019	Colorado Springs Commercial Sublease	AMcTX-00045516			
291.36		Attorney Correspondence and Legal Invoices	AMcTX-00046071-46167			
291.37	10/18/2019	A-1 Freeman Moving & Storage Invoice No. O-296-19/71615	AMcTX-00046168			
291.38	12/30/2019	A-1 Freeman Moving & Storage Invoice No. O-283-19/74590	AMcTX-00046169			
291.39	11/8/2019	Homewood Suites Receipt	AMcTX-00046170			
291.40	11/7/2019	AMc Expense Report	AMcTX-00046171			
291.41	11/8/2019	Account Statement	AMcTX-00046172			
291.42	2/4/2020	Concur Expense Report	AMcTX-00046173			
291.43	3/3/2020	Concur Expense Report	AMcTX-00046179			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
291.44	11/5/2019	Concur Expense Report	AMcTX-00046199			
291.45	11/14/2019	Concur Expense Report	AMcTX-00046213			
291.46	3/20/2020	Move it All Services Receipt	AMcTX-00046257			
291.47	3/12/2020	UPS Store Receipt	AMcTX-00046259			
291.48	10/29/2019	Xerox Invoice No. 162889933	AMcTX-00046260			
291.49	10/29/2019	Xerox Invoice No. 162890034	AMcTX-00046261			
291.50	10/29/2019	Xerox Invoice No. 162890544	AMcTX-00046262			
291.51	10/29/2019	Xerox Invoice No. 162890548	AMcTX-00046263			
291.52	5/30/2017	Colorado Springs Third Amendment to Lease	AMcTX-00046265			
291.53		TLUX CORP Invoice No. 1009	AMcTX-00046269			
291.54	1/13/2021	Email from Tyson Hartshorn to JJ Treadwell, Bill Winkler, and Mike Dennehy	AMcTX-00046274			
291.55	12/31/2019	Gaedeke Group Operation Expenses Reconciliation	AMcTX-00046286			
291.56	7/19/2016	McKinney Avenue First Amendment to Office Lease	AMcTX-00046290			
291.57	9/22/2017	North Union Street Seventh Amendment to Lease Agreement	AMcTX-00046341			
291.58	3/17/2020	North Union Street Termination of Lease Agreement	AMcTX-00046350			
291.59	1/6/2020	Colonial Parking Invoice No. 2821477	AMcTX-00046366			
291.60	6/27/2019	Email from Caile Turner to Bill Winkler, Brandon Winkler, JJ Treadwell, and Clay Turner	AMcTX-00046367			
291.61	7/1/2020	Letter from Nadine Goering (Niebur Development) to AMc	AMcTX-00046368			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
291.62	3/20/2020	Stream Realty Invoice No. SWDC26819.0	AMcTX-00046369			
291.63	2/6/2020	Colonial Parking Invoice No. 2848731	AMcTX-00046370			
291.64	3/6/2020	Colonial Parking Invoice No. 1837035	AMcTX-00046371			
291.65		COBRA Premium Reconciliations	AMcTX-00046372			
291.66		Parking Details	AMcTX-00046373			
291.67	10/17/2019	CenturyLink Invoice No. 85513654	AMcTX-00046374			
291.68	1/6/2020	Leave Severance	AMcTX-00046381			
291.69		Employee Census	AMcTX-00046382			
291.70	5/3/2019	Axis Corporate Security Invoice No. #AM 0591-1	AMcTX-00046389			
291.71	6/12/2019	AMc Production Invoice No. 167453	NRA-AMc_00079126			
291.72	6/12/2019	AMc Production Invoice No. 167448	NRA-AMc_00079132			
291.73	4/30/2017	2017 Services Agreement	NRA-AMc_00050600			
291.74	5/6/2018	2018 Amendment to Services Agreement	AMc-056592			
291.75	5/1/1999	1999 Services Agreement	NRA-AMc_00048503			
291.76	5/15/2018	Oliver North Employment Agreement	AMc-056595			
291.77	1/1/2019	Amendment to Oliver North Employment Agreement	AMc-059822			
291.78	5/29/2019	Letter from Revan McQueen to Andrew Arulanandam	NRA-AMc_00059931			
291.79	6/25/2019	Letter from Andrew Arulanandam to Revan McQueen	NRA-AMc_00060185			
291.80	3/10/2021	Topic No. 751 Social Security and Medicare Withholding Rates _ Internal Revenue Service				
291.81	3/8/2021	Topic No. 759 Form 940 – Employer's Annual Federal Unemployment (FUTA) Tax Return –				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
		Filing and Deposit Requirements _ Internal Revenue Service				
292.00	7/1/21	Rebuttal Expert Report by Dr. Richard Bergin				
292.01		NRATV Video Analytics Dashboard: Solution Overview	AMc-002656			
292.02	10/9/2018	NRATV 2018 YTD: Analytics Executive Overview	AMc-002700			
292.03	3/31/2018	NRATV Q1 2018: Analytics & Valuation	AMc-002713			
292.04	10/3/2018	NRATV YTD Q3'18 Talent Earned Media Valuation: Mass Media Approach	AMc-002786			
292.05	8/31/2017	NRATV Analytics Discussion	AMc-002818			
292.06	4/7/2019	NRATV 2019 Update	AMc-002844			
292.07	8/31/2017	The Clenched Fist of Truth	AMc-002929			
292.08	12/20/2017	NRATV: America's Most Patriotic Team in News	AMc-002957			
292.09		NRATV Q3 2017 YTD Metrics	AMc-002974			
292.10	12/31/2017	NRATV 2017 Metrics	AMc-039154			
292.11	12/31/2017	NRATV 2017 Metrics	AMc-039158			
292.12	12/31/2017	NRATV 2017 Metrics	AMc-039162			
292.13	13/31/2018	NRATV 2018 Metrics	AMc-040053			
292.14	4/25/2019	Email from Eric Van Horn to NRA	AMc-041806			
292.15	4/15/2019	NRATV Q1 2019 Metrics	AMc-041807			
292.16	5/1/2019	NRATV 2019 Update	AMcTX-00003282			
292.17		The Power of NRATV: Crafting and Owning a Narrative	AMcTX-00045966			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
292.18	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery and Revan McQueen	NRA-AMc_00059409			
292.19	5/9/2019	Email from Andrew Arulanandam to Melanie Montgomery and Henry Martin	NRA-AMc_00059652			
292.20	5/13/2019	Email from Andrew Arulanandam to Melanie Montgomery and Nader Tavangar	NRA-AMc_00124518			
292.21		Data file for PIP Dashboard	PIP-00000214_native			
292.22		Data file for PIP Dashboard	PIP-00000215_native			
292.23		Data file for PIP Dashboard	PIP-00000216_native			
292.24		Data file for PIP Dashboard	PIP-00000218_native			
292.25		Data file for PIP Dashboard	PIP-00000219_native			
292.26		Data file for PIP Dashboard	PIP-00000220_native			
292.27		Data file for PIP Dashboard	PIP-00000246_native			
292.28		Data file for PIP Dashboard	PIP-00000287_native			
292.29		Data file for PIP Dashboard	PIP-00000288_native			
292.30		Data file for PIP Dashboard	PIP-00000289_native			
292.31		Data file for PIP Dashboard	PIP-00000290_native			
292.32		Data file for PIP Dashboard	PIP-00000291_native			
292.33		Data file for PIP Dashboard	PIP-00001190_native			
292.34		Data file for PIP Dashboard	PIP-00001196_native			
292.35		Data file for PIP Dashboard	PIP-00001283_native			
292.36		Data file for PIP Dashboard	PIP-00001294_native			
292.37		Data file for PIP Dashboard	PIP-00001322_native			
292.38		Data file for PIP Dashboard	PIP-00001339_native			
292.39		Data file for PIP Dashboard	PIP-00001348_native			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
292.40		Data file for PIP Dashboard	PIP-00002807_native			
292.41		Data file for PIP Dashboard	PIP-00002890_native			
292.42		Data file for PIP Dashboard	PIP-00004232_native			
292.43		Data file for PIP Dashboard	PIP-00004365_native			
292.44		Data file for PIP Dashboard	PIP-00004392_native			
292.45	5/1/2002	NRA-ILA 2002 NRA Annual Meeting Speech By Wayne LaPierre				
292.46		Vanity Metrics: Definition, How To Identify Them, and Examples				
293.00	10/29/21	Supplemental Rebuttal Expert Report by Dr. Richard Bergin				
293.01		2018 and 2019 Budget Comparisons	AMcTX-00065376- 95395			
293.02		2018 Budget	AMcTX-00065392			
294.00	7/1/21	Rebuttal Expert Report of Daniel L. Jackson				
294.01	1/1/2018	Dana Loesch Employment Agreement	AMc-000055			
294.02	2/23/2016	Email from Melanie Montgomery to Trisha Parker	AMc-000155			
294.03	2/22/2016	Email from Melanie Montgomery to Hayley Holmes	AMc-000177			
294.04	6/1/2019	AMc Production Invoice No. 167037	AMc-042051			
294.05	5/6/2018	Amendment No. 1 to Services Agreement	AMc-056592			
294.06	5/15/2018	Oliver North Employment Agreement	AMc-056595			
294.07	1/1/2019	Amendment Number One to Oliver North Employment Agreement	AMc-059822			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
294.08	4/6/2018	Email from Kelsey Gosdin to Christy DeGuisti, Bill Winkler, and Brandon Winkler	AMcTX-00001636			
294.09	12/31/2016	AMc Consolidated Statement of Income	AMcTX-00053145			
294.10	12/31/2016	AMc Labor Breakdown	AMcTX-00053147			
294.11	12/31/2016	All GL Companies: Corporate Profit & Loss	AMcTX-00053157			
294.12	12/31/2017	AMc Consolidated Statement of Income	AMcTX-00053164			
294.13	12/31/2017	AMc Labor Breakdown	AMcTX-00053166			
294.14	12/31/2017	All GL Companies: Corporate Profit & Loss	AMcTX-00053176			
294.15	12/31/2018	AMc Consolidated Statement of Income	AMcTX-00053183			
294.16	12/31/2018	AMc Labor Breakdown	AMcTX-00053185			
294.17	12/31/2018	All GL Companies: Corporate Profit & Loss	AMcTX-00053196			
294.18	12/31/2019	AMc Consolidated Statement of Income	AMcTX-00053204			
294.19	12/31/2019	AMc Labor Breakdown	AMcTX-00053206			
294.20	12/31/2019	All GL Companies: Corporate Profit & Loss	AMcTX-00053216			
294.21	11/25/2019	COGS General Ledger	AMcTX-00053224			
294.22	11/30/2019	Invoice General Ledger	AMcTX-00053225			
294.23	5/1/2019	Invoice Breakdown	AMcTX-00053226			
294.24	12/31/2016	Edward Selfridge 2016 W-2	AMcTX-00053241			
294.25	12/31/2016	Ginny Simone 2016 W-2	AMcTX-00053242			
294.26	12/31/2017	Edward Selfridge 2017 W-2	AMcTX-00053243			
294.27	12/31/2017	Virginia Simone 2017 W-2	AMcTX-00053244			
294.28	12/31/2018	Collins Idehen 2018 W-2	AMcTX-00053245			
294.29	12/31/2018	Edward Selfridge 2018 W-2	AMcTX-00053246			
294.30	12/31/2018	Grant Stinchfield 2018 W-2	AMcTX-00053247			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
294.31	12/31/2018	Virginia Simone 2018 W-2	AMcTX-00053248			
294.32	12/31/2019	Collins Idehen 2019 W-2	AMcTX-00053249			
294.33	12/31/2019	Edward Selfridge 2019 W-2	AMcTX-00053250			
294.34	12/31/2019	Grant Stinchfield 2019 W-2	AMcTX-00053251			
294.35	5/1/1999	Services Agreement	NRA-AMc_00048503			
294.36	4/30/2017	2017 Services Agreement	NRA-AMc_00050600			
294.37	5/7/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00075497			
294.38	1/13/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00076056			
294.39	9/8/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00077292			
294.40	6/12/2019	AMc Production Invoice No. 167453	NRA-AMc_00079126			
294.41	6/12/2019	AMc Production Invoice No. 167448	NRA-AMc_00079132			
295	10/15/2021	Supplemental Rebuttal Expert Report of Daniel L. Jackson				
296		Media Buy Transaction Ledger	AMcTX-00067935			
297		PIP Dashboard https://qlik-sense.am.com User: qlik-sense/review PW: [confidential]				
298	11/11/2019	Dorsey & Whitney LLP Invoices (NRA-Related Government Proceedings)	AMcTX-00046093			
299		2018 Budget – Revised	NRA-AMc_00200745			
300	4/4/2019	McDermott Will & Emery Invoices	AMcTX-00066478			
301	7/31/2018	Email from Craig Spray to Melanie Montgomery, Bill Winkler, and Lacey Cremer	NRA-AMc_00042157			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
302	9/21/2018	Email from Lisa Supernaugh to AMc	NRA-AMc_00068513			
303	6/12/2019	Email from Nader Tavangar to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079124			
304	5/8/2019	Email from Wayne LaPierre to Mark Dycio	NRA-AMc_00199663			
305	1/5/2021	Schertler & Onorato LLP Invoices	AMcTX-00066557			
306	4/16/2019	AMc Text Messages	AMcTX-00339383			
307	9/14/2021	Letter from Sonya Rowling to NRA Finance Committee				
308	6/25/2018	Email from Christy DeGiusti to Bill Winkler	AMc-057237			
309	7/6/2018	Email from Joshua McNear to AMc	AMc-058731			
310	4/26/2018	Email from Erin Kelly to Kelsey Gosdin, Melanie Montgomery, and Lacey Duffy	AMc-059049			
311	2/22/2019	Email from Craig Spray to Nader Tavangar and Bill Winkler	AMc-040505			
312	10/9/2018	2018 NRA Budget	NRA-AMc_00200767			
313	2/27/2019	Email from Craig Spray to Melanie Montgomery, Bill Winkler, and Brandon Winkler	AMcTX-00000410			
314	12/21/2018	Email from Craig Spray to Bill Winkler	AMcTX-00000367			
315	4/6/2018	Email from Kelsey Gosdin to Christy DeGiusti, Bill Winkler, and Brandon Winkler	AMcTX-00001636			
316	4/25/2018	Email from Kelsey Gosdin to Erin Kelly	AMcTX-00004834			
317	4/26/2018	Email from Hayley Holmes to Lacey Duffy, Kari Griffith, Joshua McNear, Jordan Underwood, and Tyler Petersen	AMcTX-00004866			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
318	4/27/2018	Email from Kari Griffith to Hayley Holmes, Lacey Duffy, Joshua McNear, Jordan Underwood, and Tyler Petersen	AMcTX-00004873			
319	5/18/2018	Email from Hayley Holmes to Lacey Duffy	AMcTX-00004952			
320	8/27/2019	Letter from Andrew Arulanandam to Revan McQueen	NRA-AMc-TX00000010			
321	8/3/2018	Email from Kari Griffith to FOX News	AMcTX-00005279			
322	11/1/2018	Email from Kelsey Gosdin to Melanie Montgomery, Lacey Duffy, and Jesse Greenberg	AMcTX-00005991			
323	6/30/2016	Email from Erin Kelly to Trisha Parker, Lacey Duffy, and Melanie Montgomery	AMcTX-00271412			
324	7/21/2017	Cumulus-Dallas KPLX-FM / Mid-Mid Spot Times by Account	AMcTX-00335989			
325	7/20/2017	KLUV-FM Spot Details	AMcTX-00335991			
326	7/21/2017	iHeart Media Order No. 1119259331	AMcTX-00335993			
327	7/22/2017	All Regular Spots: Internet, KKDA-AM, KKDA-FM, KRNB-FM	AMcTX-00335996			
328	7/24/2017	Email from Eric Wang to Patrick Kobler	AMcTX-00336002			
329	1/31/2019	EFT Payment to AMc	NRA-AMc_0079008			
330	12/31/2002	AMc "Audit" Process and Findings	NRA-AMc_00089371			
331	12/31/2001	AMc "Audit" Process and Findings	NRA-AMc_00137590			
332	12/31/2014	AMc "Audit" Process and Findings	NRA-AMc_00185505			
333	12/31/2007	AMc "Audit" Process and Findings	NRA-AMc_00185508			
334	12/31/2004	AMc "Audit" Process and Findings	NRA-AMc_00185512			
335	12/31/2005	AMc "Audit" Process and Findings	NRA-AMc_00185515			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
336	5/6/2018	Amendment No. 1 to Services Agreement	NRA-AMc_00057325			
337		NRA Travel and Business Expense Reimbursement Policy				
338	8/28/2018	Email from Josh Powell to Melanie Montgomery and Lacey Duffy	AMcTX-00000703			
339	6/30/2018	WBB Investments Account Statement	AMcTX-00002406			
340	5/31/2018	WBB Investments Account Statement	AMcTX-00002407			
341	5/30/2018	Check to WBB Investments No. 633597	AMcTX-00002457			
342	6/14/18	Check to NRA from WBB Investments	AMcTX-00002459			
343	5/11/2018	Company Agreement of WBB Investments, LLC	AMcTX-00002989			
344	6/28/2018	Letter from Andrew Arulanandam to David Schertler	NRA-AMc_00065184			
345	11/29/2018	EFT Payment to AMc	NRA-AMc_00193696			
346	12/27/2018	EFT Payment to AMc	NRA-AMc_00193703			
347	12/19/2018	EFT Payment to AMc	NRA-AMc_00193736			
348	8/20/2019	Plaintiff's Responses and Objections to Defendant Ackerman McQueen, Inc.'s First Set of Interrogatories				
349	1/7/2019	Email from Lisa Supernaugh to Craig Spray	NRA-AMc_00135444			
350	4/29/2019	NRA Report of the Audit Committee	DB_0013			
351	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery and Revan McQueen	NRA-AMc_00059409			
352	3/5/2018	Brewer Firm Engagement Letter				
353		Inside the NRA by Joshua L. Powell				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
354	6/22/2020	Order Denying NRA's Motion to Enter Proposed Protective Order for Non-Parties				
355	4/9/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00059407			
356	2/8/2016	Wayne LaPierre Financial Disclosure Questionnaire (2016-21)	NRA-NYAG-00009723			
357	7/24/2021	AMc's Amended Notice of Intention to Take Oral Deposition of Corporate Representative(s) of the NRA				
358	10/29/2021	NRA Objections and Responses to AMc's First Set of Interrogatories				
359	10/29/2021	NRA Objections and Responses to AMc's First Set of Requests for Admission				
360	7/26/2018	Compliance Meeting Sign-In Sheets	NRA-BK-00058015			
361	3/11/2020	NRA Financial Statements as of December 31, 2019 and 2018				
362	1/30/2020	Letter from John Frazer to Joshua Powell	NRA-NYAG-00052610			
363	9/10/2020	NRA's Amended Response with Counterclaims Against Christopher Cox (CPR File: G-21-05-S				
364		CharityBuzz: Illusions Luxury Yacht Charter				
365	3/7/2019	Email from Melanie Montgomery to Craig Spray and Nader Tavangar	AMc-001275			
366	12/5/2016	Corporate America Aviation, Inc. Invoice No. 010317ROA				
367	5/28/2020	Letter from Richard Childress to NRA Hearing Board				
368	4/29/2019	NRA Points of Concern	NRA-AMc_00059590			

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
369	4/10/2019	Email from Melanie Montgomery to Wayne LaPierre	AMcTX_00000845			
370	8/15/2016	Letter from Performance Improvement Partners to Jesse Greenberg	PIP-00003755			
371	3/30/2017	Email from Bill Winkler to Steve Hart	Hart Ex. 17			
372	1/2/2018	Email from Joshua Powell to Tony Makris	Hallow Ex. 14			
373		AMc's 2017 NRA Budget & 2018 Proposed NRA Budget	AMcTX-00064822			
374	6/4/2019	Email from Craig Spray to Lisa Supernaugh	NRA-AMc_00065108			
375	4/1/2018	America's First Freedom				
376	2/3/2022	The Reload: NRA Revenues Cut in Half Since 2018, Legal Spending Spiked in 2021				
377	5/1/2018	Mother Jones: NRA Leader Once Worked for Professor Who Claimed Blacks Were Genetically Inferior				
378	5/5/2018	Daily Kos: NRA Board member exposed as ex-assistant of infamous racist William Shockley				
379	9/26/2019	New York Times: Who Paid for the NRA's Special Projects' Trip to Russia?				
380	4/6/2021	The Washington Post: After school shootings, NRA exec sought refuge on 108-foot yacht: 'Thank God I'm safe'				
381	8/1/2019	The Washington Post: Three NRA board members resign in latest sign of upheaval at gun rights group				
382	8/4/2018	New York Times: Beyond the NRA: Maria Butina's Peculiar Bid for Russian Influence				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
383	5/11/2021	CNN: Judge dismisses NRA's bankruptcy petition, allowing New York AG lawsuit to move forward				
384	7/30/2019	The New Yorker: New Documents Raise Ethical and Billing Concerns About the NRA's Outside Counsel				
385	6/9/2019	The Washington Post: NRA money flowed to board members amid allegedly lavish spending by top officials and vendors				
386	5/7/2019	The New Yorker: An Internal Memo Raises New Questions About Self-Dealing at the NRA				
387	8/18/2019	The Washington Post: How a hard-charging lawyer helped fuel a civil war inside the NRA				
388	11/30/2018	Wall Street Journal: NRA Awarded Contracts to Firms with Ties to Top Officials				
389	11/24/2020	The Trace: Ex-NRA Execs Fear Attorney Is Shielding LaPierre at the Group's Expense				
390	3/2/2020	The Trace: The NRA Exodus: Who Left the Organization During a Year of Upheaval				
391	9/27/2019	Rolling Stone: Senate Report on NRA/Russia Connections Brands the Gun Group a "Foreign Asset"				
392	7/29/2021	The New Yorker: How the Head of the NRA and His Wife Secretly Shipped Their Elephant Trophies Home				
393	7/14/2020	Email from Jay Madrid to Michael Collins				
394		[Intentionally Omitted]				
395		[Intentionally Omitted]				
396		[Intentionally Omitted]				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
397		[Intentionally Omitted]				
398		[Intentionally Omitted]				
399		[Intentionally Omitted]				
400	9/24/2019	**Deposition of Wayne LaPierre (Virginia) ¹				
400.1	6/17-18/2020	**Deposition of Wayne LaPierre (NYAG)				
400.2	3/22/2021	**Deposition of Wayne LaPierre (BR – Vol I)				
400.3	3/22/2021	**Deposition of Wayne LaPierre (BR – Vol II)				
400.4	8/21/2021	**Deposition of Wayne LaPierre (Texas)				
400.5	5/3/2020	**Wayne LaPierre Declaration				
400.6	8/3/2021	**Wayne LaPierre Declaration				
400.7	9/1/2021	**Wayne LaPierre Declaration				
400.8	12/20/2021	**Wayne LaPierre Declaration				
401	10/2/2019	**Deposition of Andrew Arulanandam (Virginia)				
401.1	8/27/2021	**Deposition of Andrew Arulanandam (30(b)) - Texas)				
401.2	4/14/2020	**Andrew Arulanandam Declaration				
401.3	5/1/2020	**Andrew Arulanandam Declaration				
401.4	6/14/2020	**Andrew Arulanandam Declaration				
401.5	8/3/2021	**Andrew Arulanandam Declaration				
401.6	9/1/2021	**Andrew Arulanandam Declaration				
401.7	12/20/2021	**Andrew Arulanandam Declaration				
402	1/31/2022	**Deposition of William A. Brewer, III				

¹ Any exhibit with “***” preceding the description is being presently listed and identified for reference purposes only. However, AMc reserves the right to offer all or part of these documents and/or testimony at the trial.

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
403	8/11/2021	**Deposition of Skye McQueen Brewer				
404	3/4/2020	**Travis Carter Declaration				
404.1	4/14/2020	**Travis Carter Declaration				
404.2	5/4/2020	**Travis Carter Declaration				
405	2/7/2020	**Deposition of Charles Cotton (Virginia)				
405.1	6/2/2020	**Deposition of Charles Cotton (NYAG)				
405.2	3/27/2021	**Deposition of Charles Cotton (BR – Vol I)				
405.3	3/28/2021	**Deposition of Charles Cotton (BR – Vol II)				
405.4	4/30/2020	**Charles Cotton Declaration				
405.5	8/3/2021	**Charles Cotton Declaration				
405.6	12/20/2021	**Charles Cotton Declaration				
406	7/27/2021	**Deposition of Christopher Cox				
407	7/28/2021	**Deposition of Susan Dillon				
407.1	8/7/2020	**Susan Dillon Declaration				
408	2/12/2020	**Deposition of Michael Erstling (NYAG)				
408.1	8/27/2021	**Deposition of Michael Erstling (Texas)				
408.2	4/29/2020	**Michael Erstling Declaration				
408.3	1/21/2022	**Michael Erstling Declaration				
409	1/16/2020	**Deposition of John Frazer (Virginia)				
409.01	3/15/2021	**Deposition of John Frazer (BR)				
409.02	3/18/2021	**Deposition of John Frazer (BR)				
409.03	8/19/2021	**Deposition of John Frazer (Texas)				
409.04	8/30/2021	**Deposition of John Frazer (Texas)				
409.05	10/23/2019	**John Frazer Declaration				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
409.06	5/1/2020	**John Frazer Declaration				
409.07	8/3/2021	**John Frazer Declaration				
409.08	8/3/2021	**John Frazer Declaration				
409.09	9/1/2021	**John Frazer Declaration				
409.10	11/29/2021	**John Frazer Declaration				
409.11	12/20/2021	**John Frazer Declaration				
410	8/2/2021	**Todd Grable Declaration				
410.1	9/1/2021	**Todd Grable Declaration				
411	1/10/2021	**Deposition of Millie Hallow (Virginia)				
412	2/4/2020	**Deposition of Steve Hart (Virginia)				
412.1	7/26/2021	**Deposition of Steve Hart (Texas)				
413	12/18/2021	**Declaration of William McLaughlin				
413.1	1/24/2022	**Declaration of William McLaughlin				
414	1/29/2020	**Deposition of Carolyn Meadows				
414.1	8/3/2021	**Carolyn Meadows Declaration				
414.2	8/31/2021	**Carolyn Meadows Declaration				
415	12/18/2021	**Deposition of Oliver North (Virginia/Texas)				
415.1	9/15/2021	**Deposition of Oliver North (Texas)				
416	8/30/2021	**Deposition of Woody Phillips (Texas – Vol I)				
416.1	10/20/2021	**Deposition of Woody Phillips (Texas – Vol I)				
417	1/30/2020	**Deposition of Sonya Rowling (NYAG)				
417.1	3/19/2021	**Deposition of Sonya Rowling (BR)				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
418	11/2/2020	**Deposition of Tyler Schropp (UWS)				
419	12/20/2021	**Grant Spoffard Declaration				
420	10/3/2019	**Deposition of Craig Spray (Virginia)				
420.1	3/24/2021	**Deposition of Craig Spray (BR)				
420.2	5/4/2020	**Craig Spray Declaration				
421	1/30/2020	**Deposition of Lisa Supernaugh (Virginia)				
422	3/25/2021	**Deposition of Gayle Stanford (BR)				
423	8/12/2021	**Deposition of Rick Tedrick (Texas)				
423.1	12/19/2021	**Rick Tedrick Declaration				
424	9/18/2019	**Deposition of Michael Trahar (Virginia)				
424.1	8/7/2020	**Michael Trahar Declaration				
424.2	11/29/2021	**Michael Trahar Declaration				
425	8/5/2021	**Deposition of Lacey Duffy (Texas)				
426	3/24/2021	**Deposition of Tony Makris (BR)				
426.1	8/5/2021	**Deposition of Tony Makris (Texas)				
426.2	6/3/2021	**Tony Makris Declaration				
427	8/5/2021	**Deposition of Edmund Martin (Texas)				
427.1	6/3/2020	**Edmund Martin Declaration				
428	8/23/2021	**Deposition of Revan McQueen (Texas)				
428.1	3/30/2020	**Revan McQueen Declaration				
428.2	6/3/2020	**Revan McQueen Declaration				
428.3	7/6/2021	**Revan McQueen Declaration				
429	3/31/2021	**Deposition of Melanie Montgomery (BR – 30(b)(6))				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
429.1	8/4/2021	**Deposition of AMc 30(b)(6) (Texas) (Winkler/Darley/Montgomery)				
429.2	8/6/2021	**Deposition of Melanie Montgomery (Texas)				
429.3	6/3/2020	**Melanie Montgomery Declaration				
430	8/2/2021	**Deposition of Bill Powers (Texas)				
430.1	6/3/2020	**Bill Powers Declaration				
431	8/4/2021	**Deposition of Nader Tavangar (Texas)				
431.1	6/3/2020	**Nadar Tavangar Declaration				
432	3/26/2021	**Deposition of Bill Winkler (BR – 30(b)(6))				
432.1	3/26/2021	**Deposition of Bill Winkler (BR)				
432.2	6/3/2020	**Bill Winkler Declaration				
432.3	7/6/2021	**Bill Winkler Declaration				
432.4	11/29/2021	**Bill Winkler Declaration				
432.5	12/20/2021	**Bill Winkler Declaration				
433	7/30/2021	**Deposition of Brandon Winkler				
433.1	12/20/2021	**Brandon Winkler Declaration				
434	10/29/2021	**Deposition of Brian Buss				
434.1	6/1/2021	**Expert Report of Brian Buss				
434.2	10/21/2021	**Amended and Updated Report of Brian Buss				
435	10/21/2021	**Deposition of Andrew McLean				
435.1	6/1/2021	**Expert Report of Andrew McLean				
435.2	10/18/2021	**Supplemental Report of Andrew McLean				
436	8/17/2021	**Deposition of Gary Goolsby (Vol I)				
436.1	10/12/2021	**Deposition of Gary Goolsby (Vol II)				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
436.2	6/1/2021	**Expert Report of Gary Goolsby				
436.3	8/16/2021	**Supplemental Expert Report of Gary Goolsby				
437	8/10/2021	**Deposition of Jonathan Hochman				
437.1	6/1/2021	**Expert Report of Jonathan Hochman				
437.2	10/22/2021	**First Supplemental Expert Report of Jonathan Hochman				
438	8/13/2021	**Deposition of Matthew Klink				
438.1	6/15/2021	**Expert Report of Matthew Klink				
439	8/19/2021	**Deposition of Autumn Krause				
439.1	6/15/2021	**Expert Report of Autumn Krause				
439.2	7/15/2021	**Expert Report of Autumn Krause				
440	8/12/2021	**Deposition of Larry Kanter				
440.1	7/15/2021	**Expert Report of Larry Kanter				
441	4/6/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Cotton)				
442	4/6/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Cotton / Frazer)				
443	4/7/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Frazer)				
444	4/7/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Frazer / LaPierre)				
445	4/8/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (LaPierre)				
446	4/8/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (LaPierre / Stanford / Rowling)				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
447	4/13/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Rowling / Journey)				
448	4/13/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Journey / Spray)				
449	4/16/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Spray / Makris)				
450	4/16/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Makris / Winkler / Phillips (by transcript))				
451	4/20/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Owen Mills / Roscoe Marshall / Esther Schneider / Phillips (by transcript))				
452	4/20/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Meadows (by transcript) / Hallow (by transcript))				
453	4/21/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Lee)				
454	4/21/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Lee / King)				
455	4/22/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Erstling / Wang / Schropp)				
456	4/22/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Schropp)				

Exhibit	Date	Description	Bates	Offered	Objection	Admitted
457	4/23/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Froman / Rowling)				
458	4/23/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Rowling)				
459	4/29/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Plotts / LaPierre)				

AMc reserves the right to use additional exhibits not identified herein for purposes of rebuttal or impeachment. AMc also reserves the right to rely upon and use as evidence: (i) exhibits included on the exhibit list of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned case or the Virginia litigation.

Date: February 14, 2022

Respectfully submitted,

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COUNTER-PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all parties receiving notice by and through the Court's CM/ECF system on February 14, 2022.

/s/ Brian E. Mason

Brian E. Mason